

# EXHIBIT

1

## Nadine Ranade Deposition

1 reporting to me on the project to make sure  
2 these tasks get done so I would provide voice  
3 services or data services to their various  
4 sites.

5 Q. Okay. This was a -- was this a  
6 technical project management position?

7 A. Yeah. Yeah. Yeah. Yeah. It's all  
8 technical.

9 Q. And you did not have a sales role,  
10 correct, --

11 A. No.

12 Q. -- in any way?

13 A. No, sir. No.

14 Q. Okay. And was there --

15 A. Mm-hmm.

16 Q. For example, when you were assigned to  
17 the PepsiCo, --

18 A. Mm-hmm.

19 Q. -- project, is there a BT manager who  
20 was responsible for the relationship --

21 A. Yeah.

22 Q. Let me finish.

23 -- between Pepsi and BT?

24 Yes?

25 A. Yes. There's a sales account manager.

1           being an account manager, was Sepheri -- how do  
2           you pronounce it?

3           A.    He -- he was --

4           Q.    How do -- how do you say his last  
5           name?

6           A.    Sepheri.

7           Q.    Was Mr. Sepheri the account manager  
8           for Unilever as far as --

9           A.    He's account director, actually,  
10          Mr. Sepheri. And he was directly responsible  
11          and very active, actually. He was very present  
12          and, you know, around at meetings and stuff.

13                It was very unclear at Capital Group,  
14          which was a very short-term, eight to ten-week  
15          engagement with Capital Group, and there were  
16          two managers there. Um, I -- I hate myself  
17          because I can't remember the other account  
18          manager's name. And David Upton was there, as  
19          well, but the other person was also an account  
20          manager.

21          Q.    Okay. So there were two account  
22          managers on Capital Group. Is that what you're  
23          saying?

24          A.    Yeah. Yeah.

25          Q.    And --

1 Q. Okay. How would you describe or  
2 characterize your relationship with Jayne  
3 Charlton while you worked at BT?

4 A. I had no issues in terms of my  
5 relationship with Jayne up until summer of 2010.

6 Q. Did you and Ms. Charlton ever interact  
7 outside the office?

8 A. Um, we just had professional lunch  
9 maybe a couple of times. She actually lived far  
10 away, so sometimes I drove up halfway to meet  
11 with her at some restaurant to discuss a few  
12 things. That's it.

13 Q. Okay. Since leaving BT, have you had  
14 any contact with Ms. Charlton?

15 A. Yes. Um, it -- I was shocked,  
16 actually. I was unemployed after I was  
17 dismissed from BT for almost a year -- a little  
18 over a year maybe. But then I was offered a  
19 position at AT&T in Oakton, Virginia, and I  
20 joined in early April, I believe. I was offered  
21 -- late March, early April.

22 Q. Of 2013?

23 A. 2012.

24 Q. 2012?

25 A. April of 2012.

1 do things, never gave advice in terms of what  
2 the client is expecting. He left it up to me to  
3 figure that out and do the way -- things that I  
4 would normally manage, as I have done in other  
5 projects.

6 And, actually, the -- the way I  
7 conducted the business, I completely delivered  
8 the project within that 10 weeks --

9 Q. My question to you --

10 A. Mm-hmm.

11 Q. -- was about your relationship with  
12 David Upton.

13 A. Yeah. I -- I just felt that he was  
14 not very straightforward.

15 Q. Okay. But I think you described him  
16 as letting you do your -- whatever you would  
17 normally do, --

18 A. Mm-hmm.

19 Q. -- correct?

20 A. Yeah. Yeah. And he never made any  
21 corrections. And he actually said, yeah, that's  
22 good. You know, he never -- he looked at my  
23 status reports, which were weekly. I actually  
24 conducted formal, in-person weekly meetings with  
25 the client. He attended all of those meetings.

1 Q. -- how would you characterize or  
2 describe your relationship with him while you  
3 were employed at BT?

4 A. Professional. He was same as, you  
5 know, any other manager -- account manager.

6 Q. Okay. Do you have any understanding  
7 of how Mr. Sepheri viewed you or your  
8 performance?

9 A. He actually gave very good reviews.  
10 He actually gave a very positive performance  
11 review to Jayne about my performance, in  
12 writing. I believe so.

13 Q. Okay. Anything else?

14 A. I don't recall anything. It's been  
15 some time.

16 Q. Have you had any interactions -- any  
17 communications whatsoever with Mr. Sepheri since  
18 leaving BT?

19 A. No.

20 Q. The assignment that you worked on for  
21 Mr. Sepheri, Procter & Gamble, --

22 A. No. Unilever.

23 Q. I'm -- I apologize. Unilever. Is  
24 that the only time you worked with him?

25 A. Yes.

1 Q. And Debra Gessell --

2 A. Mm-hmm.

3 Q. -- was also on the Unilever account;  
4 is that right?

5 A. Yes.

6 Q. Okay. And -- and what was your  
7 relationship with her?

8 A. She was doing -- she was responsible  
9 for different projects than what I was working  
10 on.

11 Q. And how would you describe or  
12 characterize your relationship with Ms. Gessell.

13 A. It was just professional, you know,  
14 day-to-day. She -- she answered any questions  
15 if I had any, but nothing -- nothing more. I  
16 mean --

17 Q. Do you have any idea of how -- or  
18 understanding of how she perceived your  
19 performance?

20 A. She never, um -- I -- I couldn't trust  
21 her at times. I felt that way. I'll be honest  
22 with you.

23 Q. My question to you --

24 A. Mm-hmm. No, she never gave me any  
25 direct feedback or negative feedback about

1 anything.

2 Q. Did she give you any positive  
3 feedback?

4 A. She was never part of my project or  
5 meetings.

6 Q. I'm sorry. This is going to really go  
7 too long if you're not answering my questions.

8 A. Right.

9 Q. The question was, --

10 A. Yeah.

11 Q. -- did she --

12 A. Give any feed --

13 Q. -- give you -- do you have any  
14 understanding of how she perceived you or your  
15 performance?

16 A. I didn't --

17 Q. And if you do, you do; if you don't,  
18 you don't. But you can't answer other  
19 questions.

20 A. I don't recall having any direct  
21 feedback from Debra myself.

22 Q. Any indirect feedback from her?

23 A. I don't remember. No.

24 Q. Okay. You also referenced someone  
25 named Len?



1 Q. Anything else?

2 A. Presentation stuff that I --

3 Q. Any e-mails?

4 A. Oh, no. I don't have that. Because  
5 they took my laptop, and I have no way to back  
6 that up.

7 Q. The PowerPoint that you presented --

8 A. Mm-hmm.

9 Q. -- that you put together on soft  
10 skills, --

11 A. Mm-hmm.

12 Q. -- did you present that training?

13 A. Yes. Yes. It was very well-attended.

14 Q. And what were the deficits in soft  
15 skills, or what was the area that Jayne Charlton  
16 told you you needed to improve in terms of soft  
17 skills?

18 A. She never gave me any particular  
19 feedback or -- or nailed down on a particular,  
20 um, thing about soft skills.

21 In general -- for example, like, you  
22 know, about P&G, I mentioned the person's name  
23 Barbara. She was the program manager. And had  
24 some interaction with Barbara. Barbara, I felt,  
25 was a bit insecure. And she somehow felt -- you

1 know, she -- there were just negative vibes. I  
2 tried very hard to build a relationship with  
3 Barbara because, with certain client and program  
4 management relationship, sometimes you build a  
5 relationship with that individual to make them  
6 comfortable in terms of them trusting you, you  
7 know, professionally and stuff. And so -- so I  
8 would -- I even went to the length of asking  
9 her, do you want to have lunch and let's talk  
10 and stuff. You know, and I wasn't very good at  
11 those things because I felt I have to do my  
12 work, deliver the project, and be done with it.

13 Q. So when you say you were not good at  
14 those things, what are the things that you were  
15 referring to that you were not good at?

16 A. I would say, like, relationship  
17 building in terms of, like, you know, being  
18 a little more political in terms of, you know  
19 -- so I tried, and it didn't work with Barbara.  
20 But then I came back, and -- and I told my  
21 colleagues the whole story, and they said it  
22 would have never worked with Barbara, because  
23 they had some other experiences.

24 Q. Who else had similar experiences with  
25 Barbara?

1 Q. So in your view, --

2 A. I wasn't --

3 Q. Let me finish, please.

4 A. Mm-hmm.

5 Q. Your view is that the project  
6 naturally expired and that you moved on to  
7 another project?

8 A. No. Barbara asked Steve, who was  
9 the -- I don't know his title. Barbara went to  
10 Steve, and he says, no, I want someone else to  
11 join.

12 Q. Okay. Were you kicked off the  
13 project?

14 A. I wasn't renewed on the project. The  
15 reason I'm -- I'm going to say that is because  
16 each contract is annual, and it was my year-end  
17 about to happen. I wasn't renewed on the  
18 project, and --

19 Q. Is that a -- a positive or a negative  
20 thing for your career, to not be renewed on a  
21 project that you had been on?

22 A. Neither.

23 Q. Your -- is it your view today --

24 A. Mm-hmm.

25 Q. -- that your not being renewed on

1           this project was neutral in terms of your -- a  
2           comment on your job performance?

3           A.    Um, it's not viewed negatively  
4           in -- in consulting profession, because there  
5           are turnarounds quite significantly.

6           Q.    Was it viewed negatively by BT?

7           A.    By Jayne?

8           Q.    Yeah.

9           A.    Jayne, yeah. Because she came back  
10          and told me about doing this workshop on soft  
11          skills, based on what Barbara said.

12          Q.    No. I'm asking -- and I appreciate  
13          that, but I'm asking you about being -- not  
14          being renewed -- that's your language -- on this  
15          project.

16          A.    Mm-hmm.

17          Q.    Did Jayne view that as a -- as a  
18          negative reflection on your job performance?

19          A.    She never came across and said that  
20          -- that this doesn't --

21          Q.    You don't know that to be true, that  
22          Jayne and other managers at BT viewed your being  
23          pulled off the Procter & Gamble assignment as  
24          being a very significant negative to your job  
25          performance?

1 MS. RUBIN: Objection. Assumes facts  
2 not in evidence.

3 BY MR. BROWN:

4 Q. Is -- is -- is my -- is my saying that  
5 the first time you're ever hearing that?

6 A. I -- I did not -- personally, I didn't  
7 view it, because I was on --

8 Q. I understand that you didn't view  
9 that.

10 A. Yeah.

11 Q. I understand that. My question is, --

12 A. Mm-hmm.

13 Q. -- did management at BT, Jayne, Terry  
14 or others, --

15 A. Mm-hmm.

16 Q. -- is it your understanding --

17 A. They never came across and -- and made  
18 it clear to me --

19 Q. Okay.

20 A. -- that this --

21 Q. But did you have an understanding  
22 that they viewed it as negative -- a negative  
23 reflection on your job performance to be not  
24 renewed on this Procter & Gamble assignment?

25 A. They should have communicated that to

1 Q. I said fall of 2009.

2 A. I don't remember the exact time  
3 frames, yeah.

4 Q. Okay. But do you remember in --

5 A. Jayne did.

6 Q. -- in or around the --

7 A. Yeah.

8 Q. -- towards the end of 2009 being given  
9 30 days' notice that you were going to be  
10 removed from the project?

11 A. Jayne said, yeah, we are going to  
12 -- you know, we are going to take you off P&G,  
13 you're not going to be renewed on that, and  
14 you're going to move on to Unilever account.

15 Q. Okay. And did -- and was it ever  
16 reflected to you -- relayed to you, I should  
17 say, that the reason for your removal and not  
18 being renewed on the project was because of  
19 personality conflicts between you and the  
20 Procter & Gamble site manager?

21 A. No. No. It was Barbara. It was  
22 communicated as personality issue -- I mean,  
23 relationship issue with Barbara.

24 Q. After you were notified --

25 A. Mm-hmm.

1 invite them to my kickoff calls. If I missed  
2 someone accidentally, it is not by purpose.

3 Q. Right. And I'm not asking -- and I  
4 just want to be clear --

5 A. Mm-hmm.

6 Q. -- whether you believed this to be  
7 justified or not, but is it your understanding  
8 that Procter & Gamble was not pleased your  
9 performance? Whether you think that was right  
10 or not, is it your understanding that Procter &  
11 Gamble didn't want you on their account any  
12 longer?

13 A. I disagree with that --

14 Q. Okay.

15 A. -- strongly.

16 Q. You don't have any understanding that  
17 Procter & Gamble wanted you off their account?

18 A. Only on this project. I worked on  
19 several projects with Procter & Gamble. So  
20 making a blatant statement like Procter & Gamble  
21 was unhappy, because I have a director and  
22 manager from Procter & Gamble, who actually gave  
23 me great reviews in writing, --

24 Q. I'm talking about -- fair point. I'm  
25 talking about this project, the Mehoopany

1 The reason being, I never received any  
2 communication from Procter & Gamble directly  
3 giving me that feedback.

4 Q. Did anyone give you that feedback,  
5 like Jayne, that Procter & Gamble didn't want  
6 you on the account anymore?

7 A. No. Jayne -- Jayne did not tell me  
8 specifically that Procter & Gamble didn't want  
9 me on the account. It's that Barbara didn't  
10 want me on the account.

11 Q. Barbara didn't want you on the  
12 account, correct?

13 A. Right. And Barbara is responsible.  
14 She can remove people and pick people. She's  
15 project manager for Procter -- for BT.

16 Q. Are you aware -- are you aware of her  
17 removing anyone else, other than you --

18 A. Yes. I don't know the names because  
19 I --

20 Q. -- from projects based on -- let me  
21 finish -- based on -- on her perception of their  
22 job performance?

23 A. She turned around several project  
24 managers --

25 Q. Who? Who?



1           A.    I don't remember anyone's names.   But  
2   if you do research, I'm sure you can find --

3           Q.    Can you describe who they are?   Were  
4   they men?   Were they women?   Were they -- who --  
5   who were they?

6           A.    I -- honestly, I -- I mean, there were  
7   many men and there were many women.   So I cannot  
8   say it's gender-related.   But -- but one -- but  
9   I do want to point out one thing, though, that  
10   this discussion about P&G because -- came up  
11   during my board presentation in March, you know,  
12   when I was a principal.   Because this was the  
13   only issue that they kept telling me to wait, so  
14   I brought it out and open for discussion with  
15   the board members.   And I said, here's what  
16   happened.   This is what transpired.   And this  
17   direction came from Barbara Dodd to remove me  
18   from the account based on these things.

19                So one of the board members laughed  
20   and resonated with me and says, I'm not  
21   surprised.   Barbara has personality issues.

22           Q.    You weren't promoted, right?

23           A.    No.

24           Q.    The board didn't recommend your  
25   promotion?

1 give --

2 MR. BROWN: Can I have the question --

3 THE REPORTER: Sure.

4 MR. BROWN: -- and the answer, please?

5 THE REPORTER: Sure.

6 (Referred-to testimony read back.)

7 BY MR. BROWN:

8 Q. All right. So Capital Investment  
9 Group is one?

10 A. Asset Group.

11 Q. Okay. Capital Asset Group.

12 A. I think so. I'm not sure about the  
13 name -- full name.

14 Q. But that's one you were kicked off for  
15 poor job performance?

16 A. Not poor job performance. I completed  
17 the engagement, and then I was not renewed on  
18 the account, even though I was expecting. They  
19 placed another program manager on the account.

20 Q. Was that -- were you replaced --

21 A. No, not replaced. The engagement  
22 ended. I completed the term of the engagement,  
23 and -- and then the client was so happy with our  
24 work that they came back, gave return business  
25 to -- to BT. And I was expecting in my mind

1           that I would get -- go back to that account,  
2           and, whatever transpired, they had put a more  
3           senior program manager there.

4           Q.    Okay.  So you don't know that you were  
5           kicked off the Capital Asset account?

6           A.    It was not -- it was a 10-week  
7           engagement, per Jayne, in writing.

8           Q.    Okay.  What about Unilever?  Are you  
9           aware that Unilever had asked you to be removed  
10          from the project?

11          A.    Um, Debra Gessell had -- she actually  
12          informed Jayne to take me off, and that happened  
13          due to my sick leave.

14          Q.    You believe that had to do with your  
15          sick leave --

16          A.    Yes.

17          Q.    -- and not Unilever being dissatisfied  
18          with your performance?

19          A.    That's right.  I have never received  
20          any communication from Unilever.

21          Q.    But forget communication from  
22          Unilever.  What about from BT --

23          A.    Yeah.  It was --

24          Q.    -- that Unilever was dissatisfied with  
25          your performance?

1 ranking --

2 A. Mm-hmm.

3 Q. -- of development needed. Do you see  
4 that?

5 A. Yes.

6 Q. Okay. That's below achieved  
7 standards, right?

8 A. Yes.

9 Q. And that's below good?

10 A. Mm-hmm.

11 Q. Yes?

12 A. Mm-hmm.

13 Q. Yes? Please say yes.

14 A. Yes.

15 Q. Okay. Do you have any understanding  
16 of what development needed meant?

17 A. I had requested for leave. I -- I  
18 really got sick that summer.

19 Q. No. No. No.

20 A. Mm-hmm.

21 Q. My question to you is, --

22 A. Mm-hmm.

23 Q. -- do you know what development needed  
24 meant?

25 A. No. My manager never explained to

1 me. I asked her specifically what type of  
2 development are you referring to and I disagree  
3 with you. I actually wrote it down on my  
4 performance review that I disagreed with this  
5 rating and review. I specifically communicated  
6 to her. And she said, no, don't worry about it.  
7 This will be all good for you. Take it  
8 positively and constructive -- as a constructive  
9 feedback.

10 I said, okay. And I -- I kind of  
11 felt really more personally bad because I had  
12 recently asked her for leave.

13 Q. All right. Do you have any  
14 understanding of what development needed meant?

15 A. That means you are lacking in  
16 something and you need some development, that  
17 your manager should advise you that you need to  
18 develop in this area -- specific area.

19 Q. Is it the lowest rating you could  
20 possibly get?

21 A. No.

22 Q. What's the lowest rating you could  
23 get?

24 A. Unsatisfactory.

25 Q. Okay. Is this the rating right above

1           their perception? I'm not asking you whether  
2           you agree.

3           A.     Mm-hmm.

4           Q.     My question to you is, do you recall  
5           that Unilever --

6           A.     Mm-hmm.

7           Q.     -- wanted you removed from the account  
8           prior to the end of the contract period because  
9           they perceived you negatively?

10          A.     She might have mentioned that to  
11          me, --

12          Q.     Okay.

13          A.     -- mm-hmm.

14                 It has to be if you're being removed  
15             from some account. Could be something that they  
16             don't like.

17          Q.     Mm-hmm.

18                 What was it that they didn't like  
19             about your performance?

20          A.     They didn't want me to work part  
21             time on the account. They needed -- they  
22             specifically stated they want full time -- the  
23             account manager, which is Debra. There was a  
24             conference call done between me, Jayne Charlton  
25             and Debra. And I -- my doctor had advised me to

1 Q. But maybe -- and I'm happy to show it  
2 to you.

3 A. Mm-hmm.

4 Q. Maybe this refreshes your recollection  
5 that your PIP started September 14th of 2010.

6 Does this help you in any way recall  
7 that time frame, Ms. Ranade?

8 A. Yeah. She -- she messed up with me  
9 on -- I think -- okay. December 14th, okay.

10 Q. Do you recall now -- I'll take that  
11 back.

12 A. Mm-hmm.

13 Q. Do you recall now that your  
14 Performance Improvement Plan started in or  
15 around mid-September of 2010?

16 A. After seeing this document, I recall  
17 the date.

18 Q. Yeah. Do you recall that prior -- or  
19 weeks prior to being put on the PIP --

20 A. Mm-hmm.

21 Q. -- having conversations with Jayne  
22 Charlton about how Unilever and others were not  
23 satisfied with your performance?

24 A. No. No. She never -- she never  
25 mentioned anything that would be very alarming

1 or anything that would be of great deal concern;  
2 however, --

3 Q. The PIP --

4 A. -- I had requested her, starting  
5 July/August time frame, verbally, to cut down my  
6 hours, because I'm not --

7 Q. I don't know what you're talking  
8 about. I don't know what question you're  
9 answering.

10 A. I'm just --

11 MS. RUBIN: She's explaining to you  
12 the time frame.

13 BY MR. BROWN:

14 Q. My question to you was, prior -- well,  
15 prior to receiving the PIP, did Jayne Charlton  
16 talk to you about Unilever and other clients --  
17 and others, I'm sorry, being dissatisfied with  
18 your performance?

19 A. I don't -- I don't recall. Yeah.  
20 Whatever you have discussed right now, that's  
21 all I know.

22 Q. So whatever I show you is what you  
23 remember. You don't remember independently that  
24 prior to getting the PIP in September -- on  
25 September 14th that Jayne Charlton had --



1 perception -- a negative perception.

2 So I asked her, can you please be  
3 specific who, when, what, so I can work with  
4 that individual. That was never clarified to  
5 me.

6 Q. Okay. And that conversation took  
7 place when?

8 A. I don't remember the time frame of  
9 that conversation.

10 Q. Was that conversation in or around  
11 August of 2010?

12 A. It's possible.

13 Q. Okay. When you received the PIP, --

14 A. Mm-hmm.

15 Q. -- that wasn't a -- you had been told  
16 it was coming. Isn't that also correct?

17 A. No.

18 Q. It was a surprise to you?

19 A. It was a surprise to me. She called  
20 me in the conference room --

21 Q. Mm-hmm?

22 A. -- and she says, here's what it is.  
23 I'm going to put you on this. And I said,  
24 Jayne, I don't -- I don't understand. I have  
25 delivered more projects on any of the accounts.

1 If you cumulatively take a look at other  
2 consultants and my delivery record, it  
3 specifically stands out.

4 And she says, no, Nadine. It's going  
5 to help you with your perception, and it's going  
6 to help you with your soft skills.

7 Q. What do you think the PIP was about?  
8 Why -- why do you think you were put on a PIP?

9 A. I -- she -- she put me --

10 Q. You've read it, right?

11 A. Yeah. And I totally disagreed with  
12 her. And that was done right after -- while I  
13 was going through medical treatment and I  
14 requested for leave and I requested to cut down  
15 my hours and she put me on PIP.

16 Q. You remember, do you not, in September  
17 of '09, receiving coaching, right?

18 A. About?

19 Q. Around -- in response to the principal  
20 review board decision of deferment?

21 A. Not from Jayne.

22 Q. I didn't -- do you recall receiving  
23 coaching?

24 A. Around September of --

25 Q. Of '09.

1 Q. Do you remember in August, and in  
2 particular, August 26, 2010, that there was a  
3 conference call addressing negative feedback  
4 from Dez Kerr, K-e-r-r, and Dez is D-e-z, a  
5 Unilever managing consultant, and Afshin? Do  
6 you remember that in August of 2010?

7 A. I don't remember. I'll be  
8 honest with you. I'll have to -- there was a  
9 conference call. I do recall the name Dez,  
10 but I don't remember the context of it.

11 Q. Do you remember that it -- it may have  
12 related to your being exited from Unilever four  
13 months prior to the expiration of the term?

14 A. I don't recall that, because I  
15 actually left Unilever in, I believe, December.

16 Q. Yeah. I'm talking about August, end  
17 of August. And I'm telling you that Unilever  
18 wanted you off the account in August.

19 A. I -- this is around the same time I  
20 was requesting to --

21 Q. No, it isn't.

22 A. Yes, it is. It is.

23 Q. Okay. All right.

24 A. It is.

25 Q. If that's your recollection, then

1 understand and evaluate yourself --

2 A. Mm-hmm.

3 Q. -- and how you're perceived by others.  
4 Do you remember this?

5 A. I -- I don't remember. But now I'm  
6 seeing it in writing. Except for receiving  
7 these comments from Jayne, particularly, I  
8 have never received any other comment from  
9 neither of my clients, nor any other BT manager  
10 or colleague. So Jayne was the only person who  
11 had been, you know, writing these sorts of  
12 things.

13 Q. And she was your direct supervisor,  
14 right?

15 A. I understand. But -- but there's  
16 communication between other people, as well. An  
17 -- an -- an account manager --

18 Q. Well, this was relaying --

19 A. Account manager is supposed to get  
20 feedback and they can give it back to me, as  
21 well.

22 Q. But isn't she relating -- relating to  
23 you here, and other -- and at other times, that  
24 Unilever wasn't satisfied with your performance.

25 A. I -- I'm not sure if she has

1 phone call I got a week before she dismissed me  
2 from HR that do you -- are you still suffering  
3 from any kind of pain? And I, like an idiot,  
4 said, no. And they dismissed me the following  
5 week.

6 I was never contacted by any HRMC  
7 during those 90 to 120 days.

8 Q. The next bullet says, Nadine  
9 is focused on her technical and professional  
10 development and certifications and extending  
11 that info to others via delivering KQs.

12 Do you see that?

13 A. Yes.

14 Q. Was that addressed with you, as  
15 well, that you were focused and technically  
16 proficient?

17 A. Yeah.

18 Q. Is that accurate?

19 A. That statement is.

20 Q. Yeah. So that part is accurate, but  
21 the one before it is not, right?

22 A. I never got a call. I don't even know  
23 who was HRMC who communicated with me.

24 Q. My question was, this bullet is  
25 accurate, but the one before it is not, right?

1 Q. Okay. I'm sorry. Mid-January of  
2 2011, right? You were put on the PIP --

3 A. No. I was --

4 Q. -- in September --

5 A. In September of 2010, and the --

6 Q. Right. And the PIP ended in --

7 A. First or second week of June.

8 Q. Of 2011?

9 A. Yes.

10 Q. Okay. Were there any negative  
11 performance critiques from your manager or any  
12 other supervisors at BT, or clients of BT, about  
13 your performance?

14 A. No.

15 Q. No?

16 A. No, not that I recall. I wasn't --

17 Q. Okay. You've answered the question.

18 You -- when did you begin working on  
19 the Capital Group account?

20 A. November.

21 Q. November of 2010?

22 A. Yes.

23 Q. Okay.

24 A. And the engagement was eight to ten  
25 weeks, so it ended by February 8th or February

1 10th.

2 Q. Of 2011?

3 A. Of 2011, yes.

4 Q. I'll show you an e-mail from Jayne  
5 Charlton to you --

6 A. Mm-hmm.

7 Q. -- dated March 14th, 2011.

8 (Deposition Exhibit No. 13, an e-mail  
9 from Jayne Charlton Nadine Ranade dated March  
10 14, 2011, was marked.)

11 THE REPORTER: Oh, I'm sorry. That  
12 was Number 13.

13 BY MR. BROWN:

14 Q. Looking at what has been marked  
15 for identification -- identification as Company  
16 13, which is an e-mail from Jayne Charlton to  
17 yourself dated March 14th, 2011, at 2:52 p.m.  
18 Now, will you take a moment and review this and  
19 tell me if you recall receiving this?

20 A. Yeah, I did -- I kind of remember this  
21 one, yeah.

22 Q. Mm-hmm. And what, if any -- did you  
23 -- did you have any -- well, tell me what you  
24 recall about the phone conversation, if  
25 anything, before you got this e-mail.

1 document here, she must have called me.

2 Q. Okay. Do you recall reaching out to  
3 or communicating with David Upton about this  
4 feedback?

5 A. I didn't have enough time because they  
6 dismissed me right away.

7 Q. Okay. You were dismissed right after  
8 this, correct?

9 A. Mm-hmm.

10 Q. Okay. I'm sorry. Just for the  
11 record, yes?

12 A. Yes. They -- they dismissed me right  
13 after.

14 Q. Okay. Do you recall being advised  
15 that Capital Group didn't want you working with  
16 them any longer?

17 A. Yeah. Jayne told me that they don't  
18 want you as a PM --

19 Q. Mm-hmm.

20 A. -- over there; however, our  
21 engagement had terminated by February 10th.  
22 So I successfully completed and delivered the  
23 project, and then they had returned business.  
24 Because of my work, BT got an extensive project  
25 with Capital Group.



1 Q. Do you think that you were successful  
2 in working with this client?

3 A. I delivered the product.

4 Q. Mm-hmm.

5 A. And as --

6 Q. But do you believe you were successful  
7 in working with this client?

8 A. For the job I did, yes; however, they  
9 were looking for a more senior program manager  
10 when they gave return business to BT. So they  
11 specifically said we don't want this PM.

12 Q. And that -- the PM that they  
13 specifically didn't want was you?

14 A. That's what it says in here.

15 Q. I know it's what it says in there,  
16 but do you recall that being communicated to  
17 you, that the client wanted to continue working  
18 with BT but just not you?

19 A. That's what Jayne came and told me, --

20 Q. Mm-hmm.

21 A. -- that they don't want me --

22 Q. Do you --

23 A. -- back.

24 Q. Was it communicated -- but you -- but  
25 you still view your performance with this client

1 takes a long time to build a solid relationship  
2 with any client.

3 Q. You understand, don't you, after  
4 reading this, --

5 A. Mm-hmm.

6 Q. -- and maybe your memory is refreshed  
7 on this, --

8 A. Mm-hmm.

9 Q. -- that they no longer wanted you  
10 working with them, --

11 A. That's correct.

12 Q. -- right?

13 A. Yeah.

14 Q. Okay. And how soon after this was  
15 communicated to you, what were -- what we're  
16 talking about right now with Capital Group, were  
17 you --

18 A. Mm-hmm.

19 Q. I'm not done.

20 -- were you fired?

21 A. They let me go within a -- they told  
22 -- they informed me by March 28th or 27th -- I  
23 don't remember exact date, but it was between a  
24 week, ten days.

25 Q. Okay. Now, between the time period

1           that you're no longer working on the Capital  
2           account --

3           A.    Mm-hmm.   Mm-hmm.

4           Q.    -- and the termination of your  
5           employment, --

6           A.    Yes.

7           Q.    -- you had been placed on the bench;  
8           is that right?

9           A.    Yes.

10          Q.    And what does being on the bench mean?

11          A.    That you -- that your manager is  
12          finding another project for you during that time  
13          frame.

14          Q.    You don't have a -- an assignment at  
15          that point?

16          A.    You don't have an assignment.

17          Q.    Okay.   And are you being paid at that  
18          time?

19          A.    Yes.

20          Q.    Okay.   When you were benched, --

21          A.    Mm-hmm.

22          Q.    -- or, I should say, prior to being  
23          benched, --

24          A.    Mm-hmm.

25          Q.    -- do you recall Jayne Charlton

1 (Deposition Exhibit No. 16, a document  
2 titled complaint, was marked.)

3 THE REPORTER: Number 16.

4 BY MR. BROWN:

5 Q. Why are you suing BT?

6 A. Two reasons: I mean, the current one  
7 is, basically, I felt that I really needed some  
8 time off, I was suffering, and my manager denied  
9 leaving. That's primary.

10 Secondly, as soon as I presented my  
11 principal management case, they started dinging  
12 me from every way possible they could.

13 And, thirdly, when I perceived  
14 that -- she talks about perception, my manager,  
15 all the communication is only one individual,  
16 which is Jayne Charlton, when I tried, my  
17 colleagues advised me, Nadine, there is so many  
18 other groups and managers here, go and talk to  
19 someone.

20 And when I tried to do that, if you  
21 see, she has blatantly written in here about  
22 trust and violating trust, because she -- she  
23 probably found out that I asked somebody else  
24 about career opportunities or she's too out  
25 -- open about discussing career opportunities.

1 question.

2 A. Mm-hmm.

3 Q. You -- are you alleging that the basis  
4 for your -- the termination of your employment  
5 is based on anything other than your having  
6 requested leave?

7 A. I'm basing that when I started  
8 discussing with her about my health issues in  
9 August -- July/August time frame and I need to  
10 cut down my hours, and I -- and I said I need  
11 time off or just do four hours, you know, a day,  
12 and she said -- and my -- I had to go to  
13 physical therapy two, three times a week. And  
14 she goes, oh, Nadine, just juggle. Just juggle  
15 your hours. That was -- as administrative  
16 manager, I would never advise any employee to do  
17 that, because it's not productive on a project.

18 She should have -- when -- when an  
19 application was submitted for leave, she should  
20 have taken me off this account, because you knew  
21 we were -- Deb said they said we want somebody  
22 full time on this account. And she should have  
23 taken me off that account and placed someone  
24 else and given me part-time leave.

25 Q. Do you --

1 A. She denied that.

2 Q. -- believe that you were discriminated  
3 against in any manner during your employment  
4 with BT based on your gender?

5 A. That's -- I believe --

6 Q. It's a -- it's a -- I don't know  
7 what you're about to say, but it's kind of a  
8 straightforward question. It's either a yes or  
9 a no.

10 MS. RUBIN: Well, you asked her what  
11 she believes, and she was just saying, I  
12 believe.

13 MR. BROWN: Does she believe it.

14 BY MR. BROWN:

15 Q. Okay. What do you believe? Do you  
16 believe you were discriminated based on your  
17 gender?

18 A. I believe because of my illness.

19 Q. Oh, so not based on your gender?

20 A. I don't know. It could be. It could  
21 be anything, because I -- I -- I -- based on  
22 gender I was denied promotion also. Because  
23 there was another group member, Mark, who was  
24 much less educated and inexperienced, and a  
25 number of years less senior to me, who was given

1 Q. Do you know why Jayne wanted to  
2 terminate -- terminate your employment?

3 A. It's just she's seeing that I couldn't  
4 -- I asked for leave, I'm a sick person, and I  
5 won't be able to perform, maybe I'll get sick  
6 again, and -- and I would be -- I won't be able  
7 to perform like I have in past.

8 Q. Did she ever say that to you?

9 A. Nobody would say something blatantly  
10 like that.

11 Q. Okay. But you're -- you believe that  
12 that was that was her motivation?

13 A. That's -- the paper trail shows  
14 -- demonstrates that to me.

15 Q. And what paper trail are you referring  
16 to?

17 A. When she downgraded -- started  
18 downgrading my reviews, and -- she even said  
19 -- first she told me to juggle my time while I  
20 went for therapy, and then she puts down on the  
21 PIP that I'm not allowed to take any sick leave.

22 Q. Let's talk about gender discrimination  
23 for a moment.

24 A. Mm-hmm.

25 Q. In what way do you believe that Jayne

1           A.    No.  Um, I believe I presented -- when  
2           I went to doctor's office first time, I gave my  
3           manager notification about that.  And I also  
4           gave her notification starting in August that I  
5           have -- my doctor's told me to do some physical  
6           therapy.  I'm suffering.

7           Q.    Okay.  So let me be -- be clear in my  
8           question.

9           A.    Mm-hmm.

10          Q.    The doctors don't -- that I'm  
11          referring to dated September 23rd, 2010, --

12          A.    Mm-hmm.

13          Q.    -- was that the first doctor's note  
14          that you had presented to BT of -- requesting  
15          that you be --

16          A.    Leave.

17          Q.    Requesting leave and that you  
18          accommodated in any way?

19          A.    Yes.

20          Q.    Okay.  And -- and what was the request  
21          for the accommodation?

22          A.    To cut down my hours and put me on  
23          part-time leave.

24          Q.    Okay.  And, in particular, --

25          A.    Mm-hmm.



1           opposed to a part-time schedule, which is what  
2           your doctor had proposed.

3           A.    Um, I really don't know all the rules  
4           and regulations about that, so I really don't --

5           Q.    So you're testifying. I'm not.

6           A.    Yeah.

7           Q.    So let me -- but I do want to ask you  
8           about this.

9           A.    Mm-hmm.

10          Q.    So does -- does this refresh your  
11          memory in any way that, while BT would not give  
12          you the flex time, the four hours' flex time,  
13          the alternatives were presented to you that you  
14          could either go out and not get paid at all, --

15          A.    Mm-hmm.

16          Q.    -- you could -- you could request  
17          short-term disability, you can go out on  
18          short-term disability or, if medically  
19          certified, could you come back to work?

20                Did anyone ever say that to you? Do  
21          you remember that at all?

22          A.    I'm seeing this right now, --

23          Q.    Mm-hmm.

24          A.    -- but, honestly, I don't recall,  
25          right? However, but due to the financial

1 situation, I would not have been able to go  
2 unpaid completely. And I -- I cannot take full  
3 leave because I'm able to function part time.  
4 My doctor said you are able to work part time,  
5 so it made no sense for me to take a full  
6 leave, --

7 Q. Okay.

8 A. -- when I only requested that, you  
9 know, I just need to cut my hours.

10 Q. Okay. So let me show you --

11 (Deposition Exhibit No. 20, an e-mail  
12 from Jan Escalante to Ms. Ranade dated October  
13 6th, 2010, was marked.)

14 BY MR. BROWN:

15 Q. I'm showing you a document --

16 A. Mm-hmm.

17 Q. -- marked Company Exhibit 20?

18 A. Mm-hmm.

19 Q. All right. It's an e-mail from Jan  
20 Escalante to you, dated October 6th, 2010.

21 A. Mm-hmm.

22 Q. And it says, it was nice speaking to  
23 you this afternoon. You advised that you have a  
24 doctor appointment this afternoon --

25 A. Mm-hmm.

1 constraint about working four hours was as a  
2 result of a denial of me working four hours  
3 flextime, which was not -- my client was not  
4 accommodating that, neither was my manager. She  
5 had turned it down.

6 BY MR. BROWN:

7 Q. The flex time?

8 A. Yeah. She --

9 Q. But the block time, --

10 A. The block time, I would have lost my  
11 job, she -- she blatantly said, because I don't  
12 have any other account for you to work on.

13 Q. But would you have been put on the  
14 bench?

15 A. The bench time is only, like, 30 to 60  
16 days, and then you are fired.

17 Q. So could you have been put on the  
18 bench?

19 A. Well, if I was put on -- yeah, I could  
20 have -- she could have put me on bench.

21 Q. And could there have been a position  
22 that opened while you were on the bench that  
23 could have accommodated a four-hour block?

24 A. Yes.

25 Q. Now, let me ask you this, --

1           remember calling Cigna and understanding their  
2           process of appeal.

3           Q.    Do you remember being denied  
4           short-term disability by Cigna?   Not Jayne  
5           Charlton, by Cigna the carrier?

6           A.    I didn't receive any correspondence  
7           from them.   I really didn't.   I do remember  
8           calling them, but I had -- I have nothing -- no  
9           correspondence.

10          Q.    Seeing this e-mail, does it in any  
11          way refresh your recollection as to whether your  
12          doctor provided a note stating you can return to  
13          eight hours per day effective October 6th?

14          A.    Um, it's possible that I went back  
15          after all this commotion and stress, that my  
16          manager had turned me down for not -- cutting my  
17          hours down, and then she won't have any other  
18          job for me for some time.   So I went back to my  
19          doctor's.   It's possible I negotiated with her  
20          that allowed me to go back full time while I  
21          continued my therapy.

22          Q.    Okay.   So -- and -- and I know it's  
23          possible that happened, right?

24          A.    Yes.

25          Q.    But do you remember that your doctor

1 certified --

2 A. It's possible.

3 Q. -- you to return to work without any  
4 restrictions as of October 6th?

5 A. I don't recall paperwork, but it's  
6 possible that I went back and -- and pressed on  
7 it --

8 Q. Okay. So then after October 6th --

9 A. -- due to stress because I wanted to  
10 maintain my job.

11 Q. Okay. After October 6th, 2010, --

12 A. Yeah.

13 Q. -- is it fair to say you had no  
14 medical restrictions whatsoever?

15 A. No. I did have medical restrictions.  
16 I was --

17 Q. And what were they?

18 A. I still was going through therapy. I  
19 still was in pain. But I was just --

20 Q. So with regard to the therapy, what --  
21 was that -- how much -- I mean, was that once a  
22 week, once a month, twice a week, twice a month?

23 A. I was supposed to go minimum twice a  
24 week.

25 Q. Twice a -- I'm sorry. I missed what

1           A.    No.  There was no medical  
2           certification, per se.  I -- she'll tell you I  
3           was still suffering and she strongly advised me  
4           not to do that.  But I said I need to keep my  
5           job, so I have to return full time; however, I  
6           will continue with BT, you know, and continue  
7           with the treatment, and I'll come back in a  
8           couple months.  And she advised me to go see  
9           orthopedist, and that's it.  That's the facts.

10          Q.    I just want to look -- let's look at  
11          the complaint for a moment.  Have I shown that  
12          to you?  I don't believe so.

13               MS. RUBIN:  No.

14               MR. BROWN:  We're going to take a  
15          break, because the video needs to change.

16               THE VIDEOGRAPHER:  This is the end of  
17          Tape 3 in the videotape deposition of Nadine  
18          Rana -- Ranade.

19               THE WITNESS:  Ranade.

20               THE VIDEOGRAPHER:  We're off the  
21          record at 4:02.

22               (Recess taken.)

23               THE VIDEOGRAPHER:  Here begins Tape 4  
24          in the videotape deposition of Nadine Ranade.  
25          We are back on the record at 4:06.

1 um -- that was not the time Jayne was around, I  
2 believe. It was my previous manager.

3 Q. What? In 2008?

4 A. Yeah. Yeah. I think it was 2008. I  
5 can't remember. It was a -- and -- and -- and  
6 -- and I explained, I said I might have to work  
7 from home. I'm okay, but I'm going to be lying  
8 down, and I can still work on my computer. And  
9 I think they were okay with that, so I didn't  
10 ask for any leave.

11 Q. Was that related to your neck?

12 A. No. No. It was just a personal  
13 matter, gynecological issue. And I actually  
14 worked from home --

15 Q. Mm-hmm.

16 A. -- for a few weeks and worked full  
17 time, and I was okay then.

18 Q. Okay. Other than the July 2010  
19 conversation with Jayne where you talked about  
20 your neck and she agreed with you, were there  
21 any other conversations you had with Jayne about  
22 your neck condition, your medical condition,  
23 related to your neck?

24 A. Just starting that time frame a few  
25 times, you know, I conversed with her, but no

1 other.

2 Q. Okay. And the few times that you  
3 conversed with her, what do you recall saying to  
4 her and what do you recall her saying in  
5 response?

6 A. She said, okay. She said, are you  
7 going for physical therapy? She asked me about  
8 that. I said yes. And -- and I said -- that's  
9 it. I mean, there wasn't -- not much.

10 Q. Mm-hmm.

11 A. There was nothing much to talk about.

12 Q. Okay. And with Debra, --

13 A. Mm-hmm.

14 Q. -- other than the leave issue, had you  
15 had any conversations with her --

16 A. Yes.

17 Q. -- about your medical condition?

18 A. Yes. Because when I used to go to  
19 work, her cubicle was close to mine. And I -- I  
20 detailed her everything. And, actually, I  
21 stopped taking my medication that the doctor had  
22 given me because one time I took it I was so  
23 spaced out. It was a muscle relaxer, and I  
24 couldn't function. So I told Debra the next  
25 morning. I said, Debra, I can't -- you know, I